

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202, Lobby B Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Sindi Mncina, Esq. (237862017)	CASE NO.: 23-16422-VFP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Thomas J Walsh Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

U.S. Bank NA, successor trustee to Bank of America, NA, successor in interest to LaSalle Bank NA, as trustee, on behalf of the holders of the Washington Mutual Mortgage Pass-Through Certificates, WMALT Series 2006-6 Trust ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 3), and states as follows:

1. Debtor, Thomas J Walsh, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on July 28, 2023.
2. Secured Creditor holds a security interest in the Debtor's real property located at 121 Split Rock Ln, Park Ridge, NJ 07656, by virtue of a Mortgage recorded on May 25, 2006 at Instrument number 63587.01 of the Public Records of Bergen County, NJ. Said Mortgage secures a Note in the amount of \$336,000.00.
3. The Debtor filed a Chapter 13 Plan on July 28, 2023.
4. Secured Creditor objects to the Debtor's Plan because the length of the plan is 84 months in violation of the code.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections

stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Secured Creditor
130 Clinton Road, Suite 202, Lobby B
Fairfield, NJ 07004
Telephone Number 973-575-0707

By: /s/Sindi Mncina
Sindi Mncina, Esquire
NJ Bar Number 237862017
Email: smncina@raslg.com

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Robertson, Anschutz, Schneid, Crane & Partners, PLLC 130 Clinton Road, Suite 202, Lobby B Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor Sindi Mncina, Esq. (237862017)	CASE NO.: 23-16422-VFP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Thomas J Walsh Debtor.	

CERTIFICATION OF SERVICE

1. I, Megan Day, ■ am a secretary/paralegal for Robertson, Anschutz, Schneid, Crane & Partners, PLLC, which represents U.S. Bank NA, successor trustee to Bank of America, NA, successor in interest to LaSalle Bank NA, as trustee, on behalf of the holders of the Washington Mutual Mortgage Pass-Through Certificates, WMALT Series 2006-6 Trust in the above-captioned matter.
2. On August 18, 2023, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below:

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

8/18/2023

Robertson, Anschutz, Schneid, Crane & Partners,
PLLC
Paralegal for Secured Creditor
130 Clinton Road, Suite 202, Lobby B

Fairfield, NJ 07004

Telephone: 973-575-0707

Fax: 973-404-8886

By: /s/ Megan Day

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
John P. Fazzio Fazzio Law Offices, LLC 5 Marine View Plaza Ste 218 Hoboken, NJ 07030	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Thomas J Walsh 121 Split Rock Lane Park Ridge, NJ 07656	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004-1550	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)